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*A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS*
ALLIANCES IN MEXICO
AND SRI LANKA

January 6, 2022

VIA ECF AND EMAIL

The Honorable Robert B. Kugler
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

Special Master the Honorable
Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, Case No. 1:19-md-02875-RBK: Defendants'
Replies in Support of Their Joint Motions to Exclude the General
Causation Opinions of Plaintiffs' Disclosed Experts**

Dear Judge Kugler and Special Master Vanaskie:

Pursuant to CMO 23, Special Master Order No. 55, and Federal Rule of Civil Procedure 702, please find enclosed courtesy copies of the following reply memoranda of law and supporting materials in support of Defendants' joint motions to exclude the general causation opinions of Plaintiffs' five disclosed experts, which are being filed today by the Defense Executive Committee on behalf of all Defendants in the above-captioned action:

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January 6, 2022
Page 2

- I. Mahyar Etminan, PharmD, MSc
 - A. Defendants' Reply in Support of Their Joint Motion to Exclude the Opinions of Mahyar Etminan, PharmD, MSc
- II. Stephen Hecht, Ph.D.
 - A. Defendants' Reply in Support of Their Joint Motion to Exclude the Opinions of Stephen Hecht, Ph.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibit A
- III. Stephen Lagana, M.D.
 - A. Defendants' Reply in Support of Their Joint Motion to Exclude the Opinions of Stephen Lagana, M.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibits A through J
- IV. David Madigan, Ph.D.
 - A. Defendants' Reply in Support of Their Joint Motion to Exclude the Opinions of David Madigan, Ph.D.
- V. Dipak Panigraphy, M.D.
 - A. Defendants' Reply in Support of Their Joint Motion to Exclude the Opinions of Dipak Panigraphy, M.D.

Additionally, as Defendants previously notified Plaintiffs' leadership, due to unanticipated developments outside the control of any Defendant, Defendants have withdrawn our expert oncologist, Daniel Catenacci, M.D., as a general causation expert witness in this matter. As such, Plaintiff's Motion to Preclude Opinions of Defense Expert Dr. Daniel Catenacci is now moot and will not require a ruling by this Court. Defendants intend to disclose another expert oncologist in lieu of Dr. Catenacci, and we will serve the expert's report as soon as possible.

Please let us know if we can provide any other materials.

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January 6, 2022
Page 3

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Defendants' Executive Committee (via email)
Plaintiffs' Executive Committee (via email)